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CH2MHILL

TECHNICAL STATUS REPORT

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DATE: July 10, 1995

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: June 1 through June 30, 1995

PROJECT: NPE35051.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RPI) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The new project manager at EPA 10 for the RCRA Corrective Action is Sylvia Burges; she took over the project as of June 17. She can be reached at (206)553-1254.

Sylvia Burges/EPA 10, Rene Fuentes/EPA 10, Byung Maeng/Ecology, Edwin Liu/RPI, and Liz Luecker/CH2M HILL met on June 22 at 9:30 at Bogle & Gates. Sylvia was briefed on the results of the RFI to date. She stated that Tom will follow through with the finalization of the RFI (the Round 3 and Sewer Sediments technical memoranda submittals) although she will be the one approving the RFI and the addenda. Sylvia will lead the Risk Assessment/Media Cleanup Standards oversight.

Task A2-Applicable Regulations and Permits

Storm Water Permitting.

The sediments in the storm sewers (both those that will be re-activated and those that may have discharged to the sediments in the past) were sampled May 24-25. Samples were taken from accessible manholes and catch basins where sediment was present. The samples were analyzed for semivolatile organics, metals, PCBs, BTEX, and total organic carbon; in addition, the samples from lines leading to old outfalls were also analyzed for pH, grain size, and specific gravity. Samples were analyzed in accordance with QA/QC procedures in the RFI Workplan.

Preliminary analytical data were received from S Cubed (the lab) on June 5 and 6. These data were faxed to Buzz Rahier/RPI and Sue Hays/Hays Consulting at the site. Because the concentrations were so high for some of the metals, Edwin Liu/RPI asked that we not validate the data.

A summary of the sewer sediment data compared to 20x the TCLP concentrations in 40 CFR 261.24 (indicates whether the samples might fail the TCLP for hazardous wastes) was faxed to Edwin Liu on June 9. This table indicated that the 19 of the 22 samples could fail the TCLP for lead; other metals that could fail the TCLP were chromium, cadmium, arsenic, and silver. These results indicated that all but 2 samples failed the Sediment Quality Standards. In addition, copper contamination could also classify the sediment as state dangerous waste. Therefore, the lines will be cleaned out before being abandoned or put back into service.

CH2M HILL received the final analytical results of the sewer sediment sampling on June 19. This included numerical results of the PCB sampling (the 7-day turn around analytical results only had PCB relative concentrations). One sample was significantly higher than expected (526 mg/kg in the outfall 2 line); this sample is two orders of magnitude higher than any other sewer sediment sample. RPI believes that part of this outfall line originated in an area where Pydrol was used in compressors; this is probably the source of the PCBs in the line. RPI will sample the two lines in order to separate the line that drained the compressors from the line that drained the roof when cleaning out the sewer lines.

Task A3-Interim Measures

Vanillin Building Demolition

A partial load of discolored concrete and discolored soil from the Vanillin Building foundation was shipped offsite in June. There were approximately 50,000 lbs of this material. In order to complete a full load, Buzz added approximately 2,000 lbs including catch basins stained with vanillin and discolored soil containing still bottoms from pressure washing the old RCRA storage area (part of pile F). This load was shipped offsite on June 12 and landfilled at Chemical Waste Management's facility in Arlington, Oregon.

PCB-Contaminated Compressor Pad.

Water collected during the excavation is being stored in a rented tank while awaiting disposal. The water contains 420 ppb PCBs. Activated carbon has been chosen to remove the PCBs from the water. The first filter arrived the week of June 12; however, the flow rate was set too high and did not achieve the necessary retention time in order to remove the PCBs. A second filter was ordered and started treating the PCB-contaminated water on June 29. All of the excavation water is expected to be treated by July 1. The filter media and recovered sediment will be incinerated, and the water will be discharged to METRO if it contains <5 ppb PCBs and meets the routine METRO discharge requirements for toluene, chromium, and copper.

The PCB-contaminated storm water line (to outfall 2) will be cleaned out and excavated to the extent possible. Water resulting from the clean out will be sent through the carbon used to treat the PCB-contaminated water, if possible. The sediment and clay pipe will be sent offsite with the PCB-contaminated carbon for disposal.

LNAPL.

By the end of June, significant amounts of LNAPL in the wells had disappeared. Buzz Rahier/RPI detected measurable LNAPL only in well H10. Buzz is monitoring wells H10 and MW18 once per week, depending on his workload. The remaining wells were monitored monthly as they have been in the past. During June, the amount of LNAPL measured in H10 ranged from a sheen to 0.063 feet; the amount of LNAPL measured in MW18 ranged from a sheen to not detectable. The remaining wells surveyed did not contain LNAPL beyond a film or sheen. Information on the LNAPL thicknesses is attached.

Task A5-RFI Implementation

The last batch of groundwater data were received May 8 and are in validation.
The seep and surface water data were received May 12. All of these data are currently in data validation. Some data quality issues and laboratory QA information are currently being addressed by the laboratory; once this information is received, the data in the data base will be finalized.

Task A8-Revised RFI Report

The revised RFI pages were delivered to EPA on June 19.

Copies of the RFI replacement pages were sent to Sylvia Burges/EPA 10 (2 copies) and Byung Maeng/Ecology. A full copy of the RFI was sent to Teresa Michelsen/Ecology.

Task R1-Risk Assessment/proposed Media Cleanup Standards Report

A letter was sent to Sylvia Burges/EPA by RPI stating the assumptions that will be used for the risk assessment. This letter was sent on June 8, although the letter is dated June 15.

Deliverables Submitted

The May Progress Report was submitted to U.S. EPA on June 9, 1995.

Artemis Antipas/CH2M HILL sent a letter to EPA on June 7 discussing the chromium speciation methods used in the Round 3 groundwater sampling.

A letter stating the risk assessment assumptions was sent to Sylvia Burges/EPA on June 8.

The revised RFI pages were delivered to EPA on June 19.

Progress Planned For Next Reporting Period

Task P1-Project Management

During the meeting on June 22, the attendees agreed to have a meeting the last week of July in which RPI and CH2M HILL will present the Round 3 groundwater and seep data and sewer sediments data. The Risk Assessment/MCS assumptions will also be discussed in this meeting. Byung will ask Teresa Michelsen/Ecology sediments group to attend this meeting. This meeting is currently scheduled for July 25 at 9:30 a.m. at Bogle & Gates.

Task A2-Applicable Regulations and Permits

METRO Discharges

Buzz Rahier/RPI received a letter from Cynthia Wellner/METRO approving the renewal of the METRO discharge application. The new expiration date is June 16, 2000. The discharge authorization includes investigation water and, until September 16, storm water. METRO has removed the requirement for an oil/water separator.

Northwest Container Services, Inc. is pursuing a METRO discharge authorization for their container washing operation and submitted an application to METRO on June 8.

Task A3-Interim Measures

Continue to monitor LNAPL thicknesses in monitoring wells.

We will attempt to lower the concentration of PCBs in the PCB-contaminated water to less than 5 ppb; the cleaned water will be discharged to METRO, and the contaminated carbon will be incinerated.

The sediments in the sewers will be cleaned out the first week of July by Ventilation Power. As the lines are being cleaned out, Buzz Rahier will grout up the un-needed outlets and fill the un-needed catch basins with sand. The wash water from line clean out will be placed in a 20,000 gallon Rain-For-Rent tank, and the sediments allowed to settle out. The water will be tested for potential discharge to METRO; the sediments will be taken by Ventilation Power to Phillips (formerly Burlington Environmental) for

solidification and disposal. If the water does not meet the METRO discharge limits, it will also be sent to Phillips for disposal.

Work on the sewer sediment sampling memorandum will begin in early July. As discussed with Sylvia Burges/EPA 10, the memorandum will address the sampling event and will also address clean out of the sewers.

Task A5-RFI Implementation

The Round 3 Data Technical Memorandum will be prepared once the data are validated; this work should begin in early July, assuming the data issues discussed above can be resolved.

Task R1-Risk Assessment/proposed Media Cleanup Standards Report

Risk assessment assumptions need to be agreed to by EPA and the RPI risk assessment team before additional work on the risk assessment can be done. The Risk Assessment/MCS assumptions will be discussed on the meeting in the July 25.

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